

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

BENJAMIN GILL,

Plaintiff,

v.

APEX PETRO LLC, VIRGINIA  
SINGH, MANNY SINGH, and JAY  
RAWAL,

Defendants.

**Civil Action File No.**

3:18-cv-77-TCB

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff Benjamin Gill (“Mr. Gill”) states his complaint against the above-named Defendants as follows.

1. This is a complaint for unpaid overtime compensation in violation of the Fair Labor Standards Act (“FLSA”).
2. This Court has jurisdiction over Mr. Gill’s claims, and venue is proper in this Court.
3. Defendant Apex Petro LLC (“Apex”) operates a gas station and convenience store located at 828 North Greenwood Street in Lagrange, Georgia.
4. During each of the three years preceding the filing of this complaint, Apex’s gross annual sales were greater than \$500,000.

5. During each of the three years preceding the filing of this complaint, Apex engaged in interstate commerce.
6. Defendants Virginia Singh (“Ms. Singh”), Manny Singh (“Mr. Singh”), and Jay Rawal (“Rawal”) own and operate Apex and actively manage the operations of the company.
7. As the owners and managers of Apex, Ms. Singh, Mr. Singh, and Rawal determine and control the company’s methods of compensating its employees.
8. Within the three-year period preceding the filing of this complaint, Apex, Ms. Singh, Mr. Singh, and Rawal (collectively “Defendants”) jointly employed Mr. Gill as a store manager.
9. Defendants paid Mr. Gill \$10.00 per hour.
10. Mr. Gill routinely worked more than 40 hours per week for Defendants.
11. Defendants did not pay Mr. Gill 1.5 times his regular hourly rate for his working hours over 40 per week.
12. Defendants violated the FLSA by failing to pay Mr. Gill proper overtime pay for his working hours over 40 per week.
13. Defendants’ violation of the FLSA described above was willful.

Based on the above facts, Mr. Gill requests a jury trial on all triable issues and asks the Court for the following relief: unpaid overtime wages, liquidated damages as permitted by the FLSA, prejudgment interest, litigation costs, attorneys' fees, and other relief deemed appropriate by the Court.

Respectfully submitted on July 11, 2018.

s/ Regan Keebaugh  
Regan Keebaugh  
Georgia Bar No. 535500  
April Lee  
Georgia Bar No. 487634

Radford & Keebaugh, LLC  
315 W. Ponce de Leon Ave., Suite 1080  
Decatur, Georgia 30030  
T: (678) 271-0300  
F: (678) 271-0311  
[regan@decaturlegal.com](mailto:regan@decaturlegal.com)  
[april@decaturlegal.com](mailto:april@decaturlegal.com)